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**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF UTAH**

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SECURITIES AND EXCHANGE  
 COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENAJMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O.

**DEFENDANTS DIGITAL LICENSING INC. (D/B/A “DEBT BOX”), JASON R. ANDERSON, JACOB S. ANDERSON, SCHAD E. BRANNON, AND ROYDON B. NELSON AND RELIEF DEFENDANTS BUSINESS FUNDING SOLUTIONS, LLC, BLOX LENDING, LLC, THE GOLD COLLECTIVE LLC, AND UIU HOLDINGS, LLC’S MOTION FOR ATTORNEYS’ FEES FOR MORRISON COHEN LLP; AND MEMORANDUM IN SUPPORT**

Case No. 2:23-cv-00482-RJS  
 Chief Judge Robert J. Shelby  
 Magistrate Judge Dustin B. Pead

PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual;

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

Pursuant to the Court’s Memorandum Decision and Order (ECF No. 275) entered on March 18, 2024, Defendants Digital Licensing Inc. (d/b/a “DEBT Box”), Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, and Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC, Blox Lending, LLC, The Gold Collective LLC, and UIU Holdings, LLC (collectively, the “DEBT Box Defendants”), through counsel, respectfully request the Court for an award of attorneys’ fees against Plaintiff Securities and Exchange Commission (the “Commission”) for “engag[ing] in bad faith conduct in seeking, obtaining, and defending the ex parte TRO, asset freeze, and appointment of a receiver.” Memorandum Decision and Order at 79.

As discussed in the Declaration of Richard Hong in Support of the Debt Box Defendants’ Application for Attorneys’ Fees for Morrison Cohen LLP (“Hong Declaration”) (attached hereto), the DEBT Box Defendants have incurred attorney’s fees totaling \$565,497.50 from the date of Morrison Cohen’s retention to October 6, 2023, the date of the TRO dissolution hearing. In addition, the supporting invoices (2 invoices) are separately filed under seal, subject to the Motion for Leave to File under Seal that will be contemporaneously filed.

WHEREFORE, for the reasons stated in the Hong Declaration, the DEBT Box Defendants respectfully request the Court to grant this motion in full.

Dated: April 17, 2024

Respectfully submitted,

**MORRISON COHEN LLP**

/s/ Richard Hong

Richard Hong

*Attorney for Defendants Digital Licensing Inc.,  
Jason R. Anderson, Jacob S. Anderson, Schad E.  
Brannon, Roydon B. Nelson, and Relief Defendants  
Business Funding Solutions, LLC; Blox Lending,  
LLC; The Gold Collective LLC; and UIU Holdings,  
LLC*